

POLREP No. 7

SITE DESCRIPTION:

Refer to POLREP No. 1 for a discussion of Site conditions and background.

CURRENT ACTIVITIES:

Site removal activities from 08/05/12 through 08/18/12 included:

- Continued excavation of clean overburden from the Bencik property and the Bencik/IDL transition area. Continued excavation of the LNAPL plume from the Bencik property. Completed excavation of clean overburden and contaminated material from the Potlatch/IDL transition area. Started placing clean overburden material in the Bencik/IDL, Potlatch/IDL and FHWA/Potlatch transition areas.

Continued to encounter a significant amount of product in vicinity of the 1994 Free Product Recovery System (FPRS) extraction trenches and recovery wells and the 2000 Corrective Action (CA) impermeable vertical wall and collection wells. Additionally, continued to encounter varying sizes and lengths of demolition debris, including concrete, metal, pipe, and asbestos-cement pipe buried wherever excavations are occurring.

- Completed excavation of approximately 414 feet of the St. Joe River bank. Deconstructed the temporary cofferdam, and started rebuilding the bank in the transition areas as described above. Excavation of the riverbank adjacent to the Potlatch property was stopped east of FPRS Extraction Well 1 because of space limitations associated with being in close proximity to the water treatment system. Based on field observations, the contamination likely extends along the FPRS extraction trench and possibly the CA impermeable liner.

- As of 08/17/12, 33,013 tons of contaminated materials have been shipped off-Site for disposal at the Waste Management Graham Road Recycling and Disposal Facility, Medical Lake, WA.

- Ongoing operation of the temporary water treatment system. As of 08/17/12, approximately 10,680,800 gallons of contaminated groundwater has been treated. Of this amount, approximately 8,568,200 gallons has been discharged to the St. Joe River while 1,867,500 gallons has been used on-Site for dust suppression. Operational

(effluent) samples are collected and analyzed for the contaminants of concern on an approximate weekly basis.

- Ongoing maintenance and evaluation of general construction BMPs. To date, there have been no exceedances of surface water quality measured field parameters.
- Ongoing daily routine air quality monitoring at three varying locations and surface water quality monitoring at three locations. To date, there have been no exceedances of applicable air and surface water regulatory criteria.
- Ongoing daily tailgate safety sessions discussing the project, potential hazards, required safety equipment, spill prevention and control BMPs, and anything else personnel should know.
- Continued evaluation of functional baseline project accounting and auditing arrangements and requirements for EPA, START, and ERRS due to multiple parties, settlement agreements, and funding mechanisms.
- Personnel on-Site: EPA – 1; START – 1; ERRS – 16.

PLANNED REMOVAL ACTIONS:

- Complete reconstruction of the St. Joe river bank.
- Ongoing off-Site transportation and disposal of contaminated materials.
- Continue to monitor the water treatment system to ensure it meets the required water quality discharge parameters.
- Continue to evaluate waste acceptance criteria for decontamination and/or disposal of large subsurface debris such as concrete and boulders, and the effectiveness of the proposed field screening methods to be used to determine the extent of excavation.

- Ongoing maintenance and evaluation of BMPs.
- Ongoing routine air quality and surface water quality monitoring.

NEXT STEPS:

The next POLREP will be submitted on or about 1 September 2012, and thereafter on a approximate bi-weekly schedule.

KEY ISSUES:

- The extent of contamination is greater than estimated. Originally, 32,000 tons of contaminated material was estimated to be excavated and transported off-Site for disposal. The estimated amount is now 45,000 tons.
- Based on conversations with Potlatch and its contractors, the three contaminated material containment cells and the mid-Site ingress/egress ramp will be left in place for use during the 2013 cleanup activities. Additionally, whatever amount of clean overburden material that is not used during 2012 will be left on-Site for future use.